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Attorneys for Defendant/Counterclaimant/Third-Party Plaintiff

9440 Fairview Avenue LLC, and Defendants Timothy Murray,

Joseph Sanzari Inc. and North Bergen Asphalt LLC

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Attorneys for Defendant Joseph Sanzari, individually

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AMA REALTY LLC,

CIVIL ACTION NO.: 02:13-cv-00457

Plaintiff/Counterclaim
Defendant,

FILED ELECTRONICALLY

v.

9440 FAIRVIEW AVENUE, LLC, JOSEPH
SANZARI, TIMOTHY MURRAY, JOSEPH
M. SANZARI INC., NORTH BERGEN
ASPHALT LLC, and TILCON NEW YORK,
INC.

**NOTICE OF MOTION IN LIMINE TO
PRECLUDE THE OPINIONS OF
JOHN A. LARKINS, GLENN DONOHUE
& THOMAS R. PARISI**

Defendants/Counterclaimant/
Third-Party Plaintiff

v.

MILLENNIUM RESOURCES RECOVERY,
LTD, PERFECT BODY & FENDERS CO.,
INC., and JOHN DOES 1-5.

Third-Party Defendants.

TO: Paul Batista, Esq.
26 Broadway – Suite 1900
New York, NY 10004

Michael Farhi, Esq.
Kates Nussman Rapone Ellis & Farhi, LLP
190 Moore Street, Room 306
Hackensack, NJ 07601
Attorneys for Plaintiff, AMA Realty LLC

PLEASE TAKE NOTICE that on September 26, 2019, at 10:30 a.m. or as soon thereafter as counsel may be heard, Defendant/Counterclaimant/Third-Party Plaintiff 9440 Fairview Avenue LLC, and Defendants Joseph M. Sanzari, Inc., North Bergen Asphalt LLC, and Timothy Murray, individually, by their undersigned counsel, Connell Foley LLP, and Defendant Joseph Sanzari, individually, by his counsel Krovatin Klingeman LLC (collectively “Defendants”), shall move before the Honorable John M. Vazquez, U.S.D.J., at the Martin Luther King Federal Building & U.S. Courthouse, Newark, New Jersey, for entry of an Order precluding the opinions of John A. Larkins, Glenn Donohue and Thomas R. Parisi.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely upon the Brief and the Certification of Timothy E. Corriston and Exhibits thereto, and any additional submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order has been submitted herewith pursuant to the Rules of this Court; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested on this matter.

CONNELL FOLEY LLP

By: /s/ Timothy E. Corriston, Esq.
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*Attorneys for Defendant/Counterclaimant, 9440
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Sanzari, Inc., North Bergen Asphalt LLC, Tilcon
New York Inc., and Timothy Murray, individually*

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*Attorneys for Defendant, Joseph Sanzari,
individually*

Dated: July 15, 2019